

Exhibit 10

CONFIDENTIAL
Michael Ben-Jacob - October 11, 2021

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5 IN RE:
6 CUSTOMS AND TAX ADMINISTRATION OF
7 THE KINGDOM OF DENMARK
8 (SKATTEFORVALTNINGEN) TAX REFUND
9 SCHEME LITIGATION

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15 REMOTE VTC VIDEOTAPED DEPOSITION UNDER ORAL
16 EXAMINATION OF
17 MICHAEL BEN-JACOB
18 DATE: October 11, 2021

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1 involving the purchase and sale of foreign
2 securities."

3 Do you see that?

4 A I do.

5 Q Do you recall that Mr. Woodard
6 expressed concerns into your former clients
7 about engaging in transactions involving the
8 purchase of Danish shares?

9 MR. DEWEY: Objection.

10 A I am aware that Mr. Woodard had
11 conversations with the client group in which
12 I did not participate. I don't know what
13 concerns he may or may not have raised in
14 those conversations.

15 Q At the end -- if you turn to the
16 second page of the document, the last
17 sentence says, "Finally, we expressed some
18 concern that if the plan is one in which an
19 employee or partner is a fiduciary, there may
20 be concerns under Section 4975(C)1(D), (E) or
21 (F) of the code."

22 Do you see that?

23 A I do.

24 Q Do you recall Mr. Woodard raising
25 concerns where the plan is one in which an

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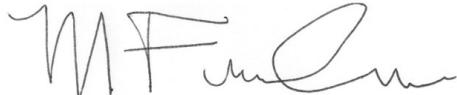
1 C E R T I F I C A T E

2 I, MICHAEL FRIEDMAN, a Certified Court
3 Reporter and Notary Public, qualified in and for
4 the State of New Jersey do hereby certify that
5 prior to the commencement of the examination
6 MICHAEL BEN-JACOB was duly affirmed by me to
7 testify to the truth the whole truth and nothing
8 but the truth.

9 I DO FURTHER CERTIFY that the foregoing
10 is a true and accurate transcript of the testimony
11 as taken stenographically by and before me at the
12 time, place and on the date hereinbefore set forth.

13 I DO FURTHER certify that I am neither a
14 relative of nor employee nor attorney nor counsel
15 for any of the parties to this action, and that I
16 am neither a relative nor employee of such attorney
17 or counsel, and that I am not financially
18 interested in the action.

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22 MICHAEL FRIEDMAN, CCR of the
23 State of New Jersey
24 License No: 30X100228600
25 Date: October 13, 2021